

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
SPARTANBURG DIVISION**

**JANE DOES 1-9,**

**Plaintiffs,**

**vs.**

**COLLINS MURPHY et. al.,**

**Defendants.**

**Case No.: 7:20-CV-00947-DCC**

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**JANE DOE,**

**Plaintiff,**

**vs.**

**LIMESTONE UNIVERSITY et. al.,**

**Defendants.**

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**Case No.: 7:21-CV-03193-DCC**

**PLAINTIFFS' REPLY TO DEFENDANTS' HAMMY MEDIA LTD d/b/a  
XHAMSTER.COM and TRAFFICSTARS LTD. RESPONSE IN OPPOSITION TO DKT.  
NO. 392**

Plaintiffs hereby submit, by and through their undersigned counsel, this Reply to Defendant's Hammy Media Ltd d/b/a XHamster.com and Trafficstars, Ltd Response in Opposition to Plaintiff's Motion to Extend Time to conduct Discovery.

Once again, the Hammy Defendants attempt to mischaracterize the allegations made against them and continue to insist that Plaintiffs efforts amount to nothing more than a "fishing expedition" and a crusade against the pornography industry. This could not be further from the truth. As outlined in Plaintiffs briefings related to their Motions to Compel against the Hammy

Defendants<sup>1</sup>, the Hammy Defendants have significantly frustrated the discovery process in this matter, on the premise that the Plaintiffs are merely trying to take down the porn industry. While the Hammy Defendants argue that the bulk of Plaintiff's Memo in Support, Dkt. Entry 392-1 is spent discussing the outstanding discovery disputes with the MindGeek Defendants, Plaintiffs' disputes with the Hammy Defendants are properly before the Court in Plaintiffs' Motions to Compel Dkt. Entries 363 and 365. In short, the discovery disputes with the Hammy Defendants include deficient discovery responses to Plaintiffs' First Set of Requests for Production, Plaintiffs' Second Set of Requests for Production to Defendant HammyMedia, Plaintiffs' First Set of Interrogatories to Defendant Trafficstars, Ltd; Plaintiffs' Second Set of Requests for Production to Defendant TrafficStars, Ltd and the failure of Mr. Christoforou to provide complete testimony.

If Plaintiffs' Motion to Compel is granted, additional time will only be required to properly review the produced discovery documents, determine if limited individuals must be deposed, and supplement any necessary expert reports. Plaintiffs have established their diligence in their pursuit of discovery, and because defendants cannot refute Plaintiffs' efforts, they resort to obscuring the facts, asserting that Plaintiffs are merely fishing. Plaintiffs only want to conduct pointed discovery to ensure this case timely gets to the finish line. The Plaintiffs do not intend to serve expansive discovery, the Plaintiffs merely want the Defendants to properly answer their already served discovery on the categories we know are relevant to this case: financial remuneration; origin of the videos; the link between the defendant companies; jurisdictional discovery inquiries; financial structure; revenue streams; content moderation, search engine optimization.

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<sup>1</sup> See Dkt. Entries 363 and 365.

Because Plaintiffs have shown that good cause exists to extend the discovery deadline, this Court should grant their Motion for Extension of Time of the Discovery deadlines.

**BELL LEGAL GROUP, LLC**

/s/ J. Edward Bell, III

J. Edward Bell, III (#1280)  
Joshua M. W. Salley (#13214)  
Gabrielle A. Sulpizio (#12715)  
219 North Ridge Street  
Georgetown, SC 29440  
Telephone: (843) 546-2408  
jeb@edbelllaw.com  
jsalley@edbelllaw.com  
*Counsel for Plaintiffs*

**DOLT, THOMPSON, SHEPHERD &  
CONWAY, PSC**

Tyler S. Thompson (admitted *Pro Hac Vice*)  
Liz J. Shepherd (admitted *Pro Hac Vice*)  
Chad Propst (Admitted *Pro Hac Vice*)  
13800 Lake Point Circle  
Louisville, KY 40223  
Telephone: (502) 244-7772  
tthompson@kytrial.com  
lshepherd@kytrial.com  
jstanton@kytrial.com  
*Counsel for Plaintiffs*

**NATIONAL CENTER ON SEXUAL  
EXPLOITATION**

Benjamin Bull (admitted *Pro Hac Vice*)  
Danielle Bianculli Pinter (admitted *Pro Hac Vice*)  
Christen Price (admitted *Pro Hac Vice*)  
Peter Gentala (admitted *Pro Hac Vice*)  
1201 F Street NW  
Washington, D.C. 20004  
[bbull@ncose.com](mailto:bbull@ncose.com)  
[dpinter@ncoselaw.org](mailto:dpinter@ncoselaw.org)  
[cprice@ncoselaw.org](mailto:cprice@ncoselaw.org)

[pgentala@ncoselaw.org](mailto:pgentala@ncoselaw.org)

*Counsel for Plaintiffs*

June 7, 2023  
Georgetown, SC